

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Inbound Air Parcel (At UPU Rates)
MC2010-11

Docket No. CP2014-14

PUBLIC REPRESENTATIVE COMMENTS ON THE
NOTICE OF THE UNITED STATES POSTAL SERVICE OF FILING CHANGES IN
RATES NOT OF GENERAL APPLICABILITY

(December 20, 2014)

The Public Representative hereby provides comments pursuant to Order No. 1910.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on changes in rates not of general applicability, for Inbound Air Parcel Post at UPU rates.² The Postal Service filed both redacted and unredacted documents to include: (1) an application for non-public treatment of materials filed under seal; (2) a copy of the Governors Decision No. 09-15;³ (3) a copy of both the classification and the proposed rates⁴ and (4) the Certification.⁵ In addition, the Postal Service filed (under seal) the workpapers for Inbound Air Parcel Post at UPU rates. The Postal Service filed rates and supporting documentation in compliance with 39 C.F.R. § 3015.5 and 39

¹ PRC Order No. 1910, Notice and Order Concerning Changes Affecting Inbound Air Parcel Post (At UPU Rates), December 17, 2013 (Notice).

² UPU refers to Universal Postal Union.

³ Decision of the Governors of the United States Postal Service on the Establishment of Prices and Classifications for Inbound Air Parcel Post At UPU Rates, November 16, 2009 (Decision No. 09-15).

⁴ The Postal Service does not propose any changes to the mail classification language. However, the numbering, of the Postal Service's Attachment A, Description of Inbound Air Parcel Post at UPU rates, begins at 2220. In reviewing, the Commission's Mail Classification Schedule (MCS) provided on its website, filename (MCSREDLINE12052013.doc), the numbering of Inbound Air Parcel Post at UPU rates begins with 2310.

⁵ Attachment 3 also identified as Attachment B of Decision No. 09-15 includes a Certification of Prices for the Inbound Air Parcel Post at UPU Rates (Certification), signed by W. Ashley Lyons. The Postal Service includes an additional Certification signed by Steven Phelps. However, the document signed by Steven Phelps does not have a docket number, or date.

U.S.C. §§ 3632 and 3633(a)(2). The Postal Service intends to implement the proposed rates as of January 1, 2014. Notice at 1.

COMMENTS

The Public Representative has reviewed the Postal Service's documentation filed both publically and under seal. Based upon that review, the Public Representative concludes that the total competitive rate changes, for Inbound Air Parcel Post, at UPU rates, appear to be sufficient such that the revenues cover costs and provide a sufficient contribution to institutional costs, thereby satisfying the requirements of 39 U.S.C. § 3633(a)(2) and is within the scope established by the Governors' Decision No. 09-15, as required by 39 U.S.C. § 3632(b)(3).

To improve transparency, I suggest that in future dockets each Certification page include the date, docket number and attachment identifier as appropriate. Dating the Certification and providing the docket number ensures that the Certification applies to the appropriate docket.

Requirements of 39 U.S.C. § 3633. Pursuant to 39 U.S.C. § 3633(a), the Postal Service's competitive prices must not result in the subsidization of competitive products by market dominant products, ensures that each competitive product covers its attributable costs, and that all competitive products collectively contribute an appropriate share to the institutional costs of the Postal Service. Based upon my review of the financial model filed under seal with the Postal Service's Notice⁶, it appears that the rates, in total, for Inbound Air Parcel Post at UPU rates should generate sufficient revenues to cover costs and provide an appropriate share to the institutional costs of the Postal Service. Therefore, the Public Representative recommends that the rates proposed, in Docket No. R2014-14, be accepted.

⁶ Notice of the United States Postal Service of Filing Changes in Rates Not of General Applicability and Application for Non-Public Treatment of Materials Filed Under Seal, December 16, 2013 (Postal Service Notice).

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

A handwritten signature in black ink, appearing to read 'Pamela A. Thompson', written over a horizontal line.

Pamela A. Thompson
Public Representative

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